



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

February 13, 2023

BY ECF

The Honorable John P. Cronan
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Spiegelman*, 20 Cr. 609 (JPC)

Dear Judge Cronan:

The Government respectfully submits this letter in response to the Court's January 31, 2023 order directing the Government to file a supplemental brief to address, among other things, whether granting the defendant's request to travel abroad for the stated purpose of relinquishing his United States citizenship would "undermine the purposes of his supervised release, particularly the purposes of reintegrating him back into the community and protecting the public from further crimes he might commit." (Dkt. No. 37 at 3). The Court ordered the Government to file its supplemental brief by February 13, 2023.

On February 13, 2023, the Court informed the parties that the U.S. Probation Office ("Probation") had apprised the Court that the defendant had submitted an expedited application for a U.S. Passport to the Department of State and made plans for imminent international travel without the authorization of the Court or Probation. (Dkt. No. 38). The Court further ordered the defendant to comply with the conditions of his supervised release, including, among other things, not knowingly leaving his district of residence absent the approval of Probation. (*Id.*).

The Government therefore requests that the Court adjourn sine die the February 13, 2023 deadline for the filing of its supplemental brief to allow the Government to further investigate the aforementioned conduct.


The Government remains available to answer any further questions of the Court.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: /s/
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The request is granted. The deadlines for the parties' supplemental briefing concerning Mr. Kikabidze's request for permission to travel to Russia are extended *sine die*. By February 28, 2023, the Government shall submit a status letter updating the Court on the progress of its investigation and either proposing a schedule for supplemental briefing or, if justified, requesting a further extension pending continued investigation.


JOHN P. CRONAN
United States District Judge

SO ORDERED
Date: February 14, 2023
New York, New York